

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-CV-12169-REK

ANN MITCHELL,
Plaintiff

v.

HALLMARK HEALTH SYSTEMS/
LAWRENCE MEMORIAL HOSPITAL
JULIE CHASE SHAUGHNESSY
Defendants

ASSENTED TO MOTION TO AMEND COMPLAINT

Plaintiff, Ann Mitchell, pursuant to Fed.R.Civ.P. 15(a), hereby moves this Honorable Court to allow Plaintiff to amend the Complaint filed in the above referenced matter.

As reasons therefore, Plaintiff states that she filed the complaint in the Superior Court in the Commonwealth of Massachusetts. Defendants removed the complaint to Federal Court. As Plaintiff was filing her complaint in state court, she did not file federal claims for employment discrimination for which there were applicable state statutes. As the Defendants have now removed the matter to Federal Court, justice and equity require that Plaintiff be allowed to amend her complaint to include applicable federal claims. Plaintiff's Amended Complaint is attached hereto.

Wherefore, Plaintiff respectfully requests that this motion be allowed.

Respectfully submitted,
ANN MITCHELL
By Her Attorney,

November 10, 2004

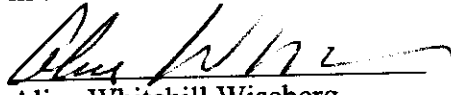
Assented To:

Macon Magee (Ann)

Alice Whitehill Wiseberg
Alice Whitehill Wiseberg
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Boston, MA 02110
(617) 304-3848
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Certification Pursuant to Local Rule 7.1(A)(2)

I hereby certify, pursuant to Local Rule 7.1(A)(2) that on November ~~12~~¹⁷, 2004 I contacted Defendants counsel, Macon Magee, by telephone and discussed in a reasonable and good faith effort to resolve and or narrow the issues addressed in this motion.


Alice Whitehill Wiseberg

Certificate of Service

I, Alice Whitehill Wiseberg, Esq., hereby certify that on this date a true copy of the above document was served upon the attorney of record for each other party by first-class mail, postage prepaid.


Alice Whitehill Wiseberg

November ~~12~~¹⁷, 2004